	1
	1
	1
9800	1
TELEPHONE: 702.369.6800	1
HONE: 7	1
TELEP	1
	1
	1
	1
	2

1	Kristina N. Holmstrom				
2	kristina.holmstrom@ogletree.com OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C. Wells Fargo Tower, Suite 1500				
3	3800 Howard Hughes Parkway				
4	Las Vegas, NV 89169 Telephone: 602-778-3700 Fax: 602-778-3750				
5					
6	Attorney for Defendants United Parcel Service, Inc.; United Parcel Service Flexible Benefit Plan; Aetna Life Insurance Company				
7	UNITED STATES DISTRICT COURT				
8	DISTRICT OF NEVADA				
9	WARREN SMITH,				
10	,	CASE NO.: 3:20-cv-00454			
11	Plaintiff,				
12	VS.	STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS			
13	UNITED PARCEL SERVICE, INC.; UNITED PARCEL SERVICE FLEXIBLE	TO RESPOND TO PLAINTIFF'S COMPLAINT			
14	BENEFIT PLAN; AETNA LIFE INSURANCE COMPANY,				
15	Defendants.				
16					
17	Plaintiff Warren Smith and Defendants United Parcel Service, Inc., United Parcel Service				
18	Flexible Benefit Plan, and Aetna Life Insurance Company (collectively the "Parties"), by their				
19	respective counsel, hereby stipulate and agree that	at Defendants may have an extension of time			
20	through and including September 21, 2020 to respond to Plaintiff's Complaint. The additional time				
21	requested is to permit Defendants to investigate and prepare a responsive pleading to Plaintiff's				
22	Complaint.				
23					
24	The Parties certify that this stipulation was done in good faith and not for the purposes of				
25	delay.				
26	WHEREFORE, the Parties jointly request that this Court adopt the proposed deadline for				
27	Defendants' response to Plaintiff's Complaint as indicated above.				
28					

25

26

27

28

1

2

3

4

5

6

7

8

9

Dated this 3rd day of September 2020. By: <u>/s/ Michael W. Flanigan</u> By: /s/Kristina N. Holmstrom Michael W. Flanigan OGLETREE, DEAKINS, NASH, FLANIGAN & BATAILLE SMOAK & STEWART, P.C. 1007 W. 3rd Ave., Ste. 206 Anchorage, Alaska, 99501 Kristina N. Holmstrom Telephone: (907) 279-9999 Nevada Bar No. 10086 Facsimile: (907) 258-3804 Wells Fargo Tower, Suite 1500 Email: mflanigan@farnorthlaw.com 3800 Howard Hughes Parkway Las Vegas, NV 89169 Pro Hac Vice Telephone: (702) 369-6800 kristina.holmstrom@ogletree.com **KENT LAW** Stephen S. Kent Nevada Bar No.: 1251 Attorneys for Defendant United Parcel 201 W. Liberty, Suite 320 Service Inc.; United Parcel Service Reno, Nevada 89501 Flexible Benefit Plan; Aetna Life Tel: 775-324-9800 Insurance Company skent@skentlaw.com Attorneys for Warren Smith IT IS SO ORDERED: DATED: September 8, 2020

Case 3:20-cv-00454-LRH-CLB Document $\ensuremath{\overline{0}}$ Filed 09/08/20 Page 3 of 3

	1	CERTIFICATE OF SERVICE		
	2	I hereby certify that on September 3, 2020, I electronically transmitted the attached document		
	3	to the Clerk's office using the CM/ECF Systems for filing and a transmittal of a Notice of	Electronic	
	4	Filing to the CM/ECF registrants:		
	5			
	6	Michael W. Flanigan FLANIGAN & BATAILLE		
	7	1007 W. 3 rd Ave., Ste. 206 Anchorage, Alaska, 99501		
	8	Telephone: (907) 279-9999		
	9	Facsimile: (907) 258-3804 Email: mflanigan@farnorthlaw.com		
ů ů	10	KENT LAW		
& STEWART, P.C.	11	Stephen S. Kent Nevada Bar No.: 1251		
STEW	12	201 W. Liberty, Suite 320 Reno, Nevada 89501		
	13 14	Tel: 775-324-9800		
, SMOAK GO TOWER ARD HUGHES NV 89169 02.369.6800	15	skent@skentlaw.com		
NASH ELLS FAR 300 How VEGAS, HONE: 7	16	Attorneys for Warren Smith		
DEAKINS, WE SUITE 1500, 38 LAS	17			
SUITE	18			
ETREE, DEAKINS V Suite 1500, L.	19	/s/ Susan Stimson An Employee of Ogletree, Deakins,		
OGL	20	Nash, Smoak & Stewart, P.C.		
	21		44045317.1	
	22			
	23			
	24			
	25			
	26			
	27			
	28			